

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,  
  
Debtors.<sup>1</sup>

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Objection Deadline: November 18,  
2023 at 4:00 p.m. (ET)**

**Hearing Date: To Be Determined**

**MOTION OF BRANDON WILLIAMS TO DISMISS THE BANKRUPTCY CASE OF  
MACLAURIN INVESTMENTS, LTD. BY JOINING IN AND ADOPTING  
THE PREVIOUSLY FILED MOTION TO DISMISS OF THE LI PARTIES**

Brandon Williams, as a party in interest under Bankruptcy Code § 1109(b), moves to dismiss this bankruptcy case for lack of subject matter jurisdiction by joining in and adopting the previously filed motion of Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG (“LI Parties”) to dismiss this bankruptcy case for lack of subject matter jurisdiction. (“LI Parties Motion,” [D.I. 3399]).<sup>2</sup> The grounds for and authorities in support of this motion are as set forth and discussed in LI Parties’ Motion and the accompanying and supporting documents and exhibits, including the

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in the above-captioned jointly-administered chapter 11 cases, a complete list of the debtors (collectively, “Debtors”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> This Motion is only directed to Case No. 22-11068 (JTD) and not to any other jointly administered case.

Appendix to the LI Parties' Motion. In further support of this motion, Brandon Williams states as follows:

1. Although he is not a creditor of Maclaurin Investments and has not filed a proof of claim, Brandon Williams is a defendant in an adversary proceeding instituted and pursued by Maclaurin Investments and FTX Trading Ltd., Adv. Pro. No. 23-50437 (JTD), to recover alleged fraudulent transfers under the Bankruptcy Code § 548 in connection with his sale of his ownership interest in Digital Assets Group AG in 2021 to Maclaurin Investments FTX Trading in an arms-length transaction.

2. In the event this case is dismissed for lack of subject matter jurisdiction, the adversary proceeding in which Williams is a defendant will also have to be dismissed for lack of subject matter jurisdiction. Williams has filed a motion to dismiss the adversary proceeding for lack of subject matter jurisdiction and has incorporated by reference the LI Parties' Motion and supporting papers.

3. Although he is not a creditor of Maclaurin Investments, Williams is a party in interest under Bankruptcy Code § 1109(b) and therefore has standing to file and pursue this motion and be heard on and in support of it. *See In re Vantage Drilling Int'l*, 603 B.R. 538, 545 (D. Del. 2019) (Citing *In re Combustion Eng'g, Inc.*, 391 F.3d 190, 214 (3d Cir. 2004) and holding that a party in interest is a person who has sufficient interest in the proceeding to require representation because of a legally protected interest that could be affected by a bankruptcy proceeding); *In re Irish Bank Resol. Corp. Ltd. (in Special Liquidation)*, 559 B.R. 627, 641 (Bankr. D. Del. 2016) (defining a party in interest as a person possessing a significant legal stake in the outcome of a case); *In re Energy Future Holdings Corp.*, 522 B.R. 520, 525–26 (Bankr. D. Del. 2015). Williams

rights in the adversary proceeding will be directly affected by the outcome of LI Parties' motion, giving him standing to be heard in support of the relief requested in that motion.

4. This motion supplements and does not withdraw the Motion to Dismiss or For Summary Judgment filed by Brandon Williams on October 25, 2023, in the above adversary proceeding. [Adv. Pro. No. 23-50437, D.I. 23].

5. To preserve his right to a jury trial in the event the LI Parties' motion is not granted, Brandon Williams does not consent to the Bankruptcy Court entering final judgment but reserves the right to do so at a later date.

#### **NOTICE**

6. Notice of this Motion has been provided to: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; and (g) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

**CONCLUSION**

For the foregoing reasons, Brandon William respectfully requests that the Court GRANT the Motion and grant such other and further relief as the Court finds just and appropriate.

/s/ Gregory L. Arbogast  
Lawrence J. Gebhardt (*pro hac vice*  
*pending*)  
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